

1 Michael W. Sobol (SBN 194857)  
msobol@lchb.com  
2 David T. Rudolph (SBN 233457)  
drudolph@lchb.com  
3 Jallé H. Dafa (SBN 290637)  
jdafa@lchb.com  
4 John D. Maher (SBN 316157)  
jmaher@lchb.com  
5 Amelia A. Haselkorn (SBN 339633)  
ahaselkorn@lchb.com  
6 Nabila Abdallah (SBN 347764)  
nabdallah@lchb.com  
7 LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
8 San Francisco, CA 94111  
Telephone: 415.956.1000  
9 Facsimile: 415.956.1008

10 *Attorney for Plaintiffs and the Class*

11  
12 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

14 Michael Katz-Lacabe, and Dr. Jennifer  
Golbeck, on behalf of themselves and all  
15 others similarly situated,

16 Plaintiffs,

17 vs.

18 ORACLE AMERICA, INC., a corporation  
organized under the laws of the State of  
19 Delaware,

20 Defendant.  
21

Case No. 3:22-cv-04792-RS

**DECLARATION OF JENNIFER GOLBECK**

22 I, Jennifer Golbeck, declare:

23 1. I am one of the settlement class representatives appointed in this case.

24 2. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees,  
25 Reimbursement of Expenses, and Plaintiff Service Awards. I have personal knowledge of the facts  
26 stated herein. If called upon as a witness, I could and would competently testify as follows.  
27  
28

1           3.       I voluntarily undertook the burdens and risks associated with this lawsuit in an  
2 effort to stop Oracle's unauthorized collection and use of my personal data, as well as that of other  
3 class members.

4           4.       I retained attorneys experienced in data privacy class action litigation to represent  
5 me in this matter. At the outset of the case, I was informed of and understood my duties as a class  
6 representative, and believe that I have fulfilled these duties.

7           5.       I have participated actively in this lawsuit. I have kept in close contact with  
8 counsel—including via video conferences, phone calls, and emails—to monitor the progress of the  
9 litigation, mediation, and settlement negotiations. I have continued to do so during the settlement  
10 approval process, as needed. In addition, I also:

- 11           • Obtained my Offline Access Request Response Report ("OARRR") containing some  
12 of the information Oracle compiled on me directly from Oracle;
- 13           • Helped counsel draft the complaints by discussing the facts surrounding Oracle's  
14 collection of my personal data, Oracle's creation of a detailed profile based on my  
15 personal data, and Oracle's representations about its collection and use of personal  
16 data;
- 17           • Participated in numerous meetings with counsel to discuss the extensive discovery  
18 served by Oracle in this case and prepare written responses;
- 19           • Searched for, provided to counsel, and preserved any hard copies or digital copies of  
20 documents that were pertinent to the case, understanding that Oracle would receive  
21 copies of documents, including sensitive documents, to which Oracle may have been  
22 entitled;
- 23           • Reviewed and discussed with counsel numerous other documents related to this case,  
24 including this Court's motion to dismiss orders, discovery request responses,  
25 preliminary approval briefing, and the Settlement Agreement;
- 26           • Provided counsel with personal devices containing sensitive information, including  
27 my smartphone and laptop computer, agreed to have the devices forensically imaged,  
28 and agreed for certain data from the forensic images to be provided to Oracle. I did so

1 despite my deep privacy concerns, which were accentuated by my work as a privacy  
2 advocate, in order to support my claims and this litigation generally. I spent a  
3 substantial amount of time interacting with my attorneys and the forensic vendor in  
4 this case as part of the forensic imaging process; and

- 5 • Submitted a declaration in support of keeping the OARRRs under seal describing my  
6 concerns about the potential harms that might result from the contents of the OARRRs  
7 being made public (Dkt Nos. 71-7, 71-8).

8 6. I did not contemporaneously record the time I spent on this case over the past  
9 approximately twenty-six months. However, my attention to this case has been frequent over that  
10 period, at points taking time out of my schedule at points several times a week.

11 7. My attorneys and I reviewed and discussed the Settlement Agreement terms, and  
12 they answered all of my questions. I conducted a final review of the Settlement Agreement,  
13 understood and agreed to the terms of the proposed Settlement Agreement, and later signed it. I  
14 believe that the monetary and injunctive relief provided by the Settlement Agreement is fair,  
15 reasonable, and in the best interests of the class, and that obtaining this relief now is preferable to  
16 continuing this litigation with an uncertain outcome.

17 8. While I did not undertake any direct financial risks in pursuing this action, I  
18 understood that, by stepping forward as a named plaintiff, I risked that information about personal  
19 life might become public, particularly in light of the publicity the case may generate. My OARRR  
20 contains substantial personal information, including demographic information, locations to which I  
21 have traveled, businesses I frequent, my shopping activities, and even the banking institutions I  
22 use. As described in my prior declaration, had the OARRRs been filed publicly in their entirety, I  
23 could have been subjected to harassment or had my financial accounts compromised. *See* Dkt. No  
24 71-7 ¶¶ 8–17. As it is, some of Oracle’s profile on me will be publicly available in perpetuity  
25 because my OARRR—with much of its contents unredacted—was an exhibit to the First Amended  
26 Complaint and Second Amended Complaint. Despite these possible negative impacts, I chose to  
27 pursue this case because I felt it was important to vindicate the rights of millions of consumers  
28 affected by Oracle’s surveillance.

